

# EXHIBIT 1

Mark David Latunski  
06/10/2021

5 JAMES CARLSEN,  
6  
7 Plaintiff,  
8 Hon. Stephen J. Murphy, III  
9 vs Magistrate Judge Anthony P. Patti  
10 Case No. 20-cv-11517  
11  
12 MARK DAVID LATUNSKI,  
13 by and through his Conservator,  
14 PAUL LATUNSKI,  
15  
16 Defendant.

20 Deposition of MARK DAVID LATUNSKI, taken  
21 in the above-entitled matter before Notary Public,  
22 Patricia A. Lutza, CSR, CRR, by Zoom Virtual Video  
23 Conference, on Thursday, June 10, 2021, commencing at  
24 about 11:30 a.m.

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1 APPEARANCES:

2

3 KIRSTINA R. MAGYARI, ESQ.  
 4 Marko Law, PLLC  
 5 1300 Broadway Street  
 6 Fifth Floor  
 7 Detroit, Michigan 48226  
 8 (313) 777-7529  
 9 [kirstie@markolaw.com](mailto:kirstie@markolaw.com)

10

11 Appear on Behalf of the Plaintiff.

12

13 CURTIS L. ZALESKI, ESQ.  
 14 Zaleski Law Firm, P.C.  
 15 535 East Main Street  
 16 Owosso, Michigan 48867  
 17 (989) 723-8166  
 18 [curtis@azlaw.us](mailto:curtis@azlaw.us)

19

20 Appear on Behalf of the Defendant.

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3 WITNESS

PAGE

4 -----

5 MARK DAVID LATUNSKI

6 Examination by Ms. Magyari

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1 INDEX OF EXHIBITS

2 -----

3 EXHIBITS MARKED OFFERED ADMITTED

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6 (No exhibits were marked  
7 in this deposition.)

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1                   Zoom Virtual Video Conference  
2                   Thursday, June 10, 2021  
3

**D E P O S I T I O N**

6                   VIDEO TECHNICIAN: On the record. This is  
7 the video deposition of Mark Latunski being taken  
8 virtually. Today is Thursday, June 10, 2021. The  
9 time on the record is approximately 11:39 a.m.  
10 Eastern Time. At this time would the attorneys  
11 please identify themselves and affiliations for the  
12 record and then our court reporter will have a  
13 statement of her own and we will swear in our  
14 witness.

15                  MS. MAGYARI: Good morning. Kirstina  
16 Magyari, on behalf of the plaintiff.

17                  MR. ZALESKI: Curt Zaleski, on behalf of  
18 the defendant Mark Latunski.

19                  MR. KRAUSE: Kurt E. Krause, on behalf of  
20 our client, who is the same client as Mr. Zaleski.

21                  MS. CHARTIER: Mary Chartier, on behalf of  
22 the defendant. Mr. Krause and I again represent him  
23 in the criminal defense matter.

24                  (The Zoom statement was read  
25 by the Court Reporter.)

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1                   MARK DAVID LATUNSKI  
2 having been first duly sworn by the Reporter, was  
3 examined and testified on his oath as follows:

**EXAMINATION****5 BY MS. MAGYARI:**

6 Q. Good morning, sir. Could you please state your full  
7 name for the record.

8                   MR. KRAUSE: Ms. Magyari, if I can just  
9 interject here quickly, for the rest of this  
10 deposition, our client, upon the advice of counsel,  
11 will be invoking his Fifth Amendment right and  
12 declining to answer questions. So with that, I just  
13 wanted to make you aware of that fact.

14                  MS. MAGYARI: Okay. I am going to proceed  
15 with questioning and you can interject --

16                  MR. KRAUSE: I understand he needs to  
17 invoke each time.

18                  MS. CHARTIER: Just so you are aware, that  
19 does include his name, as the name actually is an  
20 issue at the trial. So just we want to make sure  
21 you know we are not trying to be obstructionist,  
22 it's just I think probably every question you ask  
23 will implicate the criminal defense case.

24                  MS. MAGYARI: Understood.

25                  MR. KRAUSE: Thank you.

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1                  **1 BY MS. MAGYARI:**

2 Q. Sir, can you state your full name for the record.

3 A. **On the advice of counsel, I invoke my rights under  
4 the Fifth Amendment and decline to answer.**

5 Q. All right. My name is Kirstina Magyari. I  
6 represent James Carlsen in a lawsuit he filed  
7 against you. Have you ever provided deposition  
8 testimony before?

9 A. **On the advice of counsel, I invoke my rights under  
10 the Fifth Amendment and decline to answer.**

11 Q. Do you understand why we are here today?

12 A. **On the advice of counsel, I invoke my rights under  
13 the Fifth Amendment and decline to answer.**

14 Q. What is your date of birth, sir?

15 A. **On the advice of counsel, I invoke my rights under  
16 the Fifth Amendment and decline to answer.**

17 Q. Where are you taking this deposition from today?

18 A. **On the advice of counsel, I invoke my rights under  
19 the Fifth Amendment and decline to answer.**

20 Q. What is your home address?

21 A. **On the advice of counsel, I invoke my rights under  
22 the Fifth Amendment and decline to answer.**

23 Q. Are you currently married or have you ever been  
24 married?

25 A. **On the advice of counsel, I invoke my rights under**

1 **the Fifth Amendment and decline to answer.**

2 Q. Who is Jamie Arnold?

3 A. **On the advice of counsel, I invoke my rights under  
4 the Fifth Amendment and decline to answer.**

5 Q. Were you ever married to Jamie Arnold?

6 A. **On the advice of counsel, I invoke my rights under  
7 the Fifth Amendment and decline to answer.**

8 Q. Do you have any children?

9 A. **On the advice of counsel, I invoke my rights under  
10 the Fifth Amendment and decline to answer.**

11 Q. Have you ever been sued in any other lawsuit?

12 A. **On the advice of counsel, I invoke my rights under  
13 the Fifth Amendment and decline to answer.**

14 Q. Have you ever been convicted of a crime?

15 A. **On the advice of counsel, I invoke my rights under  
16 the Fifth Amendment and decline to answer.**

17 Q. Have you ever been diagnosed with a mental illness?

18 A. **On the advice of counsel, I invoke my rights under  
19 the Fifth Amendment and decline to answer.**

20 Q. When were you last employed?

21 A. **On the advice of counsel, I invoke my rights under  
22 the Fifth Amendment and decline to answer.**

23 Q. How did you come first to speak with James Carlsen?

24 A. **On the advice of counsel, I invoke my rights under  
25 the Fifth Amendment and decline to answer.**

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1 Q. What are your sexual preferences, sir? Are you  
2 bisexual? Heterosexual?

3 A. **On the advice of counsel, I invoke my rights under  
4 the Fifth Amendment and decline to answer.**

5 Q. Did you first speak to Mr. Carlsen via Facebook  
6 through Jamie Arnold?

7 A. **On the advice of counsel, I invoke my rights under  
8 the Fifth Amendment and decline to answer.**

9 Q. What did you and Mr. Carlsen talk about when you  
10 initially met?

11 A. **On the advice of counsel, I invoke my rights under  
12 the Fifth Amendment and decline to answer.**

13 Q. Did you tell Mr. Carlsen that your name was Lucas?

14 A. **On the advice of counsel, I invoke my rights under  
15 the Fifth Amendment and decline to answer.**

16 Q. How many times did you speak to Mr. Carlsen before  
17 he came to visit you?

18 A. **On the advice of counsel, I invoke my rights under  
19 the Fifth Amendment and decline to answer.**

20 Q. At one point you bought Mr. Carlsen a ticket to come  
21 visit you in Michigan; correct?

22 A. **On the advice of counsel, I invoke my rights under  
23 the Fifth Amendment and decline to answer.**

24 Q. Do you recall where Mr. Carlsen is from?

25 A. **On the advice of counsel, I invoke my rights under**

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1 **the Fifth Amendment and decline to answer.**

2 Q. Was one of your rules no violence, no blood and no  
3 pain?

4 A. **On the advice of counsel, I invoke my rights under  
5 the Fifth Amendment and decline to answer.**

6 Q. Mr. Carlsen came to visit you, you picked him up  
7 from the bus station; correct?

8 A. **On the advice of counsel, I invoke my rights under  
9 the Fifth Amendment and decline to answer.**

10 Q. Do you recall what you were wearing when you picked  
11 him up?

12 A. **On the advice of counsel, I invoke my rights under  
13 the Fifth Amendment and decline to answer.**

14 Q. Were you wearing a leather kilt?

15 A. **On the advice of counsel, I invoke my rights under  
16 the Fifth Amendment and decline to answer.**

17 Q. Is a leather kilt something you would wear regularly  
18 or was that a part of your role play?

19 A. **On the advice of counsel I invoke my rights under  
20 the Fifth Amendment and decline to answer.**

21 Q. Do you recall what you did with Mr. Carlsen after  
22 you picked him up?

23 A. **On the advice of counsel, I invoke my rights under  
24 the Fifth Amendment and decline to answer.**

25 Q. Was Jamie Arnold supposed to be at your house when

1 **the Fifth Amendment and decline to answer.**

2 Q. Did you set up a trip for Mr. Carlsen to come visit  
3 you to engage in role play and bondage?

4 A. **On the advice of counsel, I invoke my rights under  
5 the Fifth Amendment and I decline to answer.**

6 Q. What was the purpose of Mr. Carlsen's trip to come  
7 visit you?

8 A. **On the advice of counsel, I invoke my rights under  
9 the Fifth Amendment and decline to answer.**

10 Q. Is role play and/or bondage something that you did  
11 often prior to meeting Mr. Carlsen?

12 A. **On the advice of counsel, I invoke my rights under  
13 the Fifth Amendment and decline to answer.**

14 Q. How many times have you met up with strangers that  
15 you did not know personally to engage in role play,  
16 bondage or sexual acts?

17 A. **On the advice of counsel, I invoke my rights under  
18 the Fifth Amendment and decline to answer.**

19 Q. Did you and Mr. Carlsen discuss any roles for your  
20 engagement when he came to visit?

21 A. **On the advice of counsel, I invoke my rights under  
22 the Fifth Amendment and decline to answer.**

23 Q. Was one of your roles not to touch people while they  
24 were sleeping?

25 A. **On the advice of counsel, I invoke my rights under**

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1 Mr. Carlsen came to visit?

2 A. **On the advice of counsel, I invoke my rights under  
3 the Fifth Amendment and decline to answer.**

4 Q. Why wasn't Jamie Arnold there when he came to your  
5 house -- Mr. Carlsen?

6 A. **On the advice of counsel, I invoke my rights under  
7 the Fifth Amendment and decline to answer.**

8 Q. Did Mr. Carlsen fall asleep in your vehicle on the  
9 way to your house?

10 A. **On the advice of counsel, I invoke my rights under  
11 the Fifth Amendment and decline to answer.**

12 Q. What did Mr. Carlsen do when you got back to your  
13 home?

14 A. **On the advice of counsel, I invoke my rights under  
15 the Fifth Amendment and decline to answer.**

16 Q. Did you and Mr. Carlsen spend a few days together?

17 A. **On the advice of counsel, I invoke my rights under  
18 the Fifth Amendment and decline to answer.**

19 Q. Did you watch movies about Vikings with Mr. Carlsen?

20 A. **On the advice of counsel, I invoke my rights under  
21 the Fifth Amendment and decline to answer.**

22 Q. Did you place an ankle restraint on Mr. Carlsen  
23 while he was sleeping?

24 A. **On the advice of counsel, I invoke my rights under  
25 the Fifth Amendment and decline to answer.**

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1 Q. Can you describe the purpose of that ankle restraint  
2 that's in your basement?

3 A. **On the advice of counsel, I invoke my rights under  
4 the Fifth Amendment and decline to answer.**

5 Q. Do you recall Mr. Carlsen telling you that he was  
6 unhappy that you put this restraint on him while he  
7 was sleeping?

8 A. **On the advice of counsel, I invoke my rights under  
9 the Fifth Amendment and decline to answer.**

10 Q. What type of role play are you interested in?

11 A. **On the advice of counsel, I invoke my rights under  
12 the Fifth Amendment and decline to answer.**

13 Q. Is bondage and sexual acts something that you are  
14 interested in?

15 A. **On the advice of counsel, I invoke my rights under  
16 the Fifth Amendment and decline to answer.**

17 Q. Can you tell me about pig and butcher role play.

18 A. **On the advice of counsel, I invoke my rights under  
19 the Fifth Amendment and decline to answer.**

20 Q. Did you do pig and butcher role play with Jamie  
21 Arnold?

22 A. **On the advice of counsel, I invoke my rights under  
23 the Fifth Amendment and decline to answer.**

24 Q. Pig and butcher role play involve one person being  
25 hung upside down; is that correct?

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1 specifically use for your sexual encounter?

2 A. **On the advice of counsel, I invoke my rights under  
3 the Fifth Amendment and decline to answer.**

4 Q. Do you call that room your sex dungeon?

5 A. **On the advice of counsel, I invoke my rights under  
6 the Fifth Amendment and decline to answer.**

7 Q. Was Mr. Carlsen the first man you used this room  
8 with or did you use it with other individuals as  
9 well?

10 A. **On the advice of counsel, I invoke my rights under  
11 the Fifth Amendment and decline to answer.**

12 Q. Did you tell Mr. Carlsen there was a room in your  
13 house that was your son's room that he was forbidden  
14 from entering?

15 A. **On the advice of counsel, I invoke my rights under  
16 the Fifth Amendment and decline to answer.**

17 Q. Did you tell Mr. Carlsen that you consume animal  
18 testicles?

19 A. **On the advice of counsel, I invoke my rights under  
20 the Fifth Amendment and decline to answer.**

21 Q. Do you enjoy eating Rocky Mountain oysters?

22 A. **On the advice of counsel, I invoke my rights under  
23 the Fifth Amendment and decline to answer.**

24 Q. While Mr. Carlsen and you were playing pig and  
25 butcher while he was hanging upside down, did you

1 A. **On the advice of counsel, I invoke my rights under  
2 the Fifth Amendment and decline to answer.**

3 Q. How many individuals have you engaged with pig and  
4 butcher role play with?

5 A. **On the advice of counsel, I invoke my rights under  
6 the Fifth Amendment and decline to answer.**

7 Q. Did you engage in pig and butcher role play with  
8 Mr. Carlsen?

9 A. **On the advice of counsel, I invoke my rights under  
10 the Fifth Amendment and decline to answer.**

11 Q. Were you the butcher?

12 A. **On the advice of counsel, I invoke my rights under  
13 the Fifth Amendment and decline to answer.**

14 Q. Did you hang Mr. Carlsen upside down from the  
15 ceiling?

16 A. **On the advice of counsel, I invoke my rights under  
17 the Fifth Amendment and decline to answer.**

18 Q. Did you and Mr. Carlsen engage in oral sex?

19 A. **On the advice of counsel, I invoke my rights under  
20 the Fifth Amendment and decline to answer.**

21 Q. In your sexual acts or role play, you prefer to be  
22 the dominant one; correct?

23 A. **On the advice of counsel, I invoke my rights under  
24 the Fifth Amendment and decline to answer.**

25 Q. Is there a room in your basement that you

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1 pull a knife on him?

2 A. **On the advice of counsel, I invoke my rights under  
3 the Fifth Amendment and decline to answer.**

4 Q. How did it make you feel to pull a knife on him?

5 A. **On the advice of counsel, I invoke my rights under  
6 the Fifth Amendment and decline to answer.**

7 Q. Did it excite you to threaten Mr. Carlsen in this  
8 way?

9 A. **On the advice of counsel, I invoke my rights under  
10 the Fifth Amendment and decline to answer.**

11 Q. Was threatening Mr. Carlsen with a knife something  
12 you and he discussed prior to doing so?

13 A. **On the advice of counsel, I invoke my rights under  
14 the Fifth Amendment and decline to answer.**

15 Q. Did Mr. Carlsen react when you pulled a knife on  
16 him?

17 A. **On the advice of counsel, I invoke my rights under  
18 the Fifth Amendment and decline to answer.**

19 Q. Was there a point where Mr. Carlsen left your home?

20 A. **On the advice of counsel, I invoke my rights under  
21 the Fifth Amendment and decline to answer.**

22 Q. Did you go into your basement and found that he had  
23 left?

24 A. **On the advice of counsel, I invoke my rights under  
25 the Fifth Amendment and decline to answer.**

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1 Q. What did you do after Mr. Carlsen left?  
 2 A. **On the advice of counsel, I invoke my rights under**  
**3 the Fifth Amendment and decline to answer.**  
 4 Q. Did he have to cut himself out of the restraints you  
 5 placed on him in order to get free?  
 6 A. **On the advice of counsel, I invoke my rights under**  
**7 the Fifth Amendment and decline to answer.**  
 8 Q. Do you have any idea why Mr. Carlsen would have  
 9 left?  
 10 A. **On the advice of counsel, I invoke my rights under**  
**11 the Fifth Amendment and decline to answer.**  
 12 Q. Did you know that he took your car keys at that  
 13 time?  
 14 A. **On the advice of counsel, I invoke my rights under**  
**15 the Fifth Amendment and decline to answer.**  
 16 Q. Did you ask him why he took your car keys or why he  
 17 left?  
 18 A. **On the advice of counsel, I invoke my rights under**  
**19 the Fifth Amendment and decline to answer.**  
 20 Q. Was Mr. Carlsen trying to go home at this time?  
 21 A. **On the advice of counsel, I invoke my rights under**  
**22 the Fifth Amendment and decline to answer.**  
 23 Q. Did you tell him that you wouldn't purchase him a  
 24 ticket to go home and his ticket wasn't good for a  
 25 few more days?

Page 20

1 Hawaii?  
 2 A. **On the advice of counsel, I invoke my rights under**  
**3 the Fifth Amendment and decline to answer.**  
 4 Q. Did Mr. Carlsen ever tell you he wanted to leave  
 5 sooner and just go home?  
 6 A. **On the advice of counsel, I invoke my rights under**  
**7 the Fifth Amendment and decline to answer.**  
 8 Q. Did you have any idea that Mr. Carlsen had spoken to  
 9 police at that time?  
 10 A. **On the advice of counsel, I invoke my rights under**  
**11 the Fifth Amendment and decline to answer.**  
 12 Q. Does the term hero have any special significance to  
 13 you?  
 14 A. **On the advice of counsel, I invoke my rights under**  
**15 the Fifth Amendment and decline to answer.**  
 16 Q. After Mr. Carlsen left for Hawaii, did you make any  
 17 plans for the future?  
 18 A. **On the advice of counsel, I invoke my rights under**  
**19 the Fifth Amendment and decline to answer.**  
 20 Q. Did you communicate with Mr. Carlsen in any format  
 21 after he left your home?  
 22 A. **On the advice of counsel, I invoke my rights under**  
**23 the Fifth Amendment and decline to answer.**  
 24 Q. How often did you speak if at all after he left your  
 25 home?

1 A. **On the advice of counsel, I invoke my rights under**  
**2 the Fifth Amendment and decline to answer.**  
 3 Q. Did Mr. Carlsen have to go back to your house?  
 4 A. **On the advice of counsel, I invoke my rights under**  
**5 the Fifth Amendment and decline to answer.**  
 6 Q. Do you recall telling police that Mr. Carlsen left  
 7 your house and had been walking down the street  
 8 going to Owosso?  
 9 A. **On the advice of counsel, I invoke my rights under**  
**10 the Fifth Amendment and decline to answer.**  
 11 Q. How many times have you had men over to your house  
 12 to engage in role play?  
 13 A. **On the advice of counsel, I invoke my rights under**  
**14 the Fifth Amendment and decline to answer.**  
 15 Q. What did you and Mr. Carlsen do when he returned to  
 16 your home?  
 17 A. **On the advice of counsel, I invoke my rights under**  
**18 the Fifth Amendment and decline to answer.**  
 19 Q. How long did Mr. Carlsen stay at your home?  
 20 A. **On the advice of counsel, I invoke my rights under**  
**21 the Fifth Amendment and decline to answer.**  
 22 Q. Did you eventually take Mr. Carlsen to the airport?  
 23 A. **On the advice of counsel, I invoke my rights under**  
**24 the Fifth Amendment and decline to answer.**  
 25 Q. Did you purchase the ticket for Mr. Carlsen to go to

Page 21

1 A. **On the advice of counsel, I invoke my rights under**  
**2 the Fifth Amendment and decline to answer.**  
 3 Q. When is the last time you spoke to Mr. Carlsen?  
 4 A. **On the advice of counsel, I invoke my rights under**  
**5 the Fifth Amendment and decline to answer.**  
 6 Q. Did you tell Mr. Carlsen about spending time with  
 7 Kevin Bacon?  
 8 A. **On the advice of counsel, I invoke my rights under**  
**9 the Fifth Amendment and decline to answer.**  
 10 Q. What did you tell him about Kevin Bacon?  
 11 A. **On the advice of counsel, I invoke my rights under**  
**12 the Fifth Amendment and decline to answer.**  
 13 Q. Is Kevin Bacon another man that came over to your  
 14 house to engage in sex for role play with you?  
 15 A. **On the advice of counsel, I invoke my rights under**  
**16 the Fifth Amendment and decline to answer.**  
 17 Q. How did you meet Kevin Bacon?  
 18 A. **On the advice of counsel, I invoke my rights under**  
**19 the Fifth Amendment and decline to answer.**  
 20 Q. Did you engage in any pig and butcher role play with  
 21 Mr. Bacon?  
 22 A. **On the advice of counsel, I invoke my rights under**  
**23 the Fifth Amendment and decline to answer.**  
 24 Q. Did you hang Kevin Bacon from the ceiling like you  
 25 hung Mr. Carlsen from the ceiling?

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Page 23

1 A. **On the advice of counsel, I invoke my rights under**  
2 **the Fifth Amendment and decline to answer.**  
3 Q. What else did you do with Kevin Bacon?  
4 A. **On the advice of counsel, I invoke my rights under**  
5 **the Fifth Amendment and decline to answer.**  
6 Q. Did you tell Mr. Carlsen that you ate Kevin Bacon's  
7 oyster?  
8 A. **On the advice of counsel, I invoke my rights under**  
9 **the Fifth Amendment and decline to answer.**  
10 Q. When you use the word oyster in this context, did  
11 you mean his testicle?  
12 A. **On the advice of counsel, I invoke my rights under**  
13 **the Fifth Amendment and decline to answer.**  
14 Q. Did you fry and eat Kevin Bacon's testicle?  
15 A. **On the advice of counsel, I invoke my rights under**  
16 **the Fifth Amendment and decline to answer.**  
17 Q. Did you video chat with Mr. Carlsen while Kevin  
18 Bacon was at your house?  
19 A. **On the advice of counsel, I invoke my rights under**  
20 **the Fifth Amendment and decline to answer.**  
21 Q. And Kevin Bacon is deceased; correct?  
22 A. **On the advice of counsel, I invoke my rights under**  
23 **the Fifth Amendment and decline to answer.**  
24 Q. Was Kevin Bacon already deceased when you video  
25 called Mr. Carlsen?

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1 **the Fifth Amendment and decline to answer.**  
2 Q. Between the time where Mr. Carlsen had been at your  
3 house and Kevin Bacon had been at your house, do you  
4 recall a time where another man was seen running  
5 from your home?  
6 A. **On the advice of counsel, I invoke my rights under**  
7 **the Fifth Amendment and decline to answer.**  
8 Q. Do you recall that man's name?  
9 A. **On the advice of counsel, I invoke my rights under**  
10 **the Fifth Amendment and decline to answer.**  
11 Q. How did you meet that man?  
12 A. **On the advice of counsel, I invoke my rights under**  
13 **the Fifth Amendment and decline to answer.**  
14 Q. Did you engage in role play with that man as well?  
15 A. **On the advice of counsel, I invoke my rights under**  
16 **the Fifth Amendment and decline to answer.**  
17 Q. Did you pull a knife on that man as well, is that  
18 why he was running from your house?  
19 A. **On the advice of counsel, I invoke my rights under**  
20 **the Fifth Amendment and decline to answer.**  
21 Q. Can you tell me about the roles that you and  
22 Mr. Carlsen had set for when he came to your house?  
23 A. **On the advice of counsel, I invoke my rights under**  
24 **the Fifth Amendment and decline to answer.**  
25 Q. Did Mr. Carlsen consent to you pulling a knife on

1 A. **On the advice of counsel, I invoke my rights under**  
2 **the Fifth Amendment and decline to answer.**  
3 Q. What happened to Kevin Bacon?  
4 A. **On the advice of counsel, I invoke my rights under**  
5 **the Fifth Amendment and decline to answer.**  
6 Q. Did the police come to your home while you were on  
7 the phone with Mr. Carlsen?  
8 A. **On the advice of counsel, I invoke my rights under**  
9 **the Fifth Amendment and decline to answer.**  
10 Q. Did you tell Mr. Carlsen that you killed Kevin  
11 Bacon?  
12 A. **On the advice of counsel, I invoke my rights under**  
13 **the Fifth Amendment and decline to answer.**  
14 Q. Did you kill Kevin Bacon?  
15 A. **On the advice of counsel, I invoke my rights under**  
16 **the Fifth Amendment and decline to answer.**  
17 Q. Who is Edgar Hill?  
18 A. **On the advice of counsel, I invoke my rights under**  
19 **the Fifth Amendment and decline to answer.**  
20 Q. Do you recall telling police that your name was  
21 Edgar Hill?  
22 A. **On the advice of counsel, I invoke my rights under**  
23 **the Fifth Amendment and decline to answer.**  
24 Q. What about the name Bilk, B-I-L-K?  
25 A. **On the advice of counsel, I invoke my rights under**

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1 him or threatening him?  
2 A. **On the advice of counsel, I invoke my rights under**  
3 **the Fifth Amendment and decline to answer.**  
4 Q. Can you tell me about the type of activities you and  
5 Mr. Carlsen engaged in at your home?  
6 A. **On the advice of counsel, I invoke my rights under**  
7 **the Fifth Amendment and decline to answer.**  
8 Q. Where were you working at the time you met  
9 Mr. Carlsen?  
10 A. **On the advice of counsel, I invoke my rights under**  
11 **the Fifth Amendment and decline to answer.**  
12 Q. Did you own the home that you had Mr. Carlsen over  
13 to visit you in?  
14 A. **On the advice of counsel, I invoke my rights under**  
15 **the Fifth Amendment and decline to answer.**  
16 Q. How did you afford to buy Mr. Carlsen a ticket to  
17 Hawaii?  
18 A. **On the advice of counsel, I invoke my rights under**  
19 **the Fifth Amendment and decline to answer.**  
20 Q. Did you know why he wanted to go to Hawaii?  
21 A. **On the advice of counsel, I invoke my rights under**  
22 **the Fifth Amendment and decline to answer.**  
23 Q. Do you regularly meet men online and invite them  
24 over to your house and engage in role play or  
bondage?

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Page 27

1 A. **On the advice of counsel, I invoke my rights under**

2 **the Fifth Amendment and decline to answer.**

3 Q. Did you and Mr. Carlsen make any plans for the  
4 future when he left your home for Hawaii?

5 A. **On the advice of counsel, I invoke my rights under**  
6 **the Fifth Amendment and decline to answer.**

7 MS. MAGYARI: All right. That's all I  
8 have for you, Mr. Latunski. Thank you.

9 VIDEO TECHNICIAN: Are there any questions  
10 from anybody else?

11 MS. CHARTIER: No. Thank you.

12 MR. ZALESKI: I have no questions.

13 VIDEO TECHNICIAN: All right then. That  
14 concludes this deposition. We are going off the  
15 record. The time is 12:02 p.m.

16 MS. MAGYARI: Etran, please.

17 MR. ZALESKI: I like the mini, pdf mini.

18 MR. KRAUSE: The same, please.

19 (Deposition concluded at about 12:03 p.m.)

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1 CERTIFICATE OF REPORTER

2  
3 STATE OF MICHIGAN )  
4 ) SS  
5 COUNTY OF INGHAM )

6 I hereby certify that on the date and at  
7 the place hereinbefore set forth, I reported  
8 stenographically the proceedings held in the matter  
9 hereinbefore set forth, and that the testimony so recorded  
10 was subsequently transcribed by me with the use of  
11 computer-aided transcription under my direction and  
12 supervision, and that the foregoing is a full, true and  
13 accurate transcript of my original stenotype notes.

14

15

16

17

*Patricia A. Lutza*

18 Patricia A. Lutza

(CSR-2493)

19 Certified Shorthand Reporter

20

Notary Public:

21 County of Eaton

My Commission Expires:

22 June 6, 2024

23

24

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